

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

MAR 12 2019

JAMES W. McCORMACK, CLERK
By: ABW D.P. CLERK

**FORM TO BE USED BY PRISONERS IN FILING A COMPLAINT
UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. § 1983**

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS
DIVISION**

CASE NO. 3:19-CV-52-DPM

Jury Trial: ☐ Yes ☐ No
(Check One)

I. Parties

In item A below, place your full name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.

A. Name of plaintiff: Karlen Ingram
ADC # 31474009 Pulaski County Jail
Address: 3201 W Roosevelt Little Rock AR 72204
Name of plaintiff: _____
ADC # _____
Address: _____
This case assigned to District Judge Marshall
Name of plaintiff: _____ and to Magistrate Judge Deere
ADC # _____
Address: _____

In item B below, place the full name of the defendant in the first blank, his official position in the second blank, his place of employment in the third blank, and his address in the fourth blank.

B. Name of defendant: Melvin Watson
Position: Confidential Informant
Place of employment: West Memphis Police Dept
Address: Unknown
Name of defendant: West Memphis Police Department
Position: Supervisor

Place of employment: West Memphis Police Department

Address: Unknown

Name of defendant: Stacy Allen

Position: Detective

Place of employment: West Memphis Police Dept

Address: Unknown

Name of defendant: _____

Position: _____

Place of employment: _____

Address: _____

II. Are you suing the defendants in:

- ☐ official capacity only
☐ personal capacity only
☒ both official and personal capacity

III. Previous lawsuits

- A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action?

Yes ___ No ✓

- B. If your answer to A is yes, describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

- ☐ Parties to the previous lawsuit:

Plaintiffs: _____

Defendants: _____

☐ Court (if federal court, name the district; if state court, name the county): _____

☐ Docket Number: _____

☐ Name of judge to whom case was assigned: _____

☐ Disposition: (for example: Was the case dismissed? Was it appealed? Is it still pending?) _____

☐ Approximate date of filing lawsuit: _____

☐ Approximate date of disposition: _____

IV. Place of present confinement: _____

V. At the time of the alleged incident(s), were you:
(check appropriate blank)

_____ in jail and still awaiting trial on pending criminal charges

_____ serving a sentence as a result of a judgment of conviction

☒ in jail for other reasons (e.g., alleged probation violation, etc.)
explain: _____

VI. The Prison Litigation Reform Act (PLRA), 42 U.S.C. § 1997e, requires complete exhaustion of administrative remedies of all claims asserted, prior to the filing of a lawsuit. There is a prisoner grievance procedure in the Arkansas Department of Correction, and in several county jails. Failure to complete the exhaustion process provided as to each of the claims asserted in this complaint may result in the dismissal without prejudice of all the claims raised in this complaint.

A. Did you file a grievance or grievances presenting the facts set forth in this complaint?

Yes ☒ No _____

B. Did you completely exhaust the grievance(s) by appealing to all levels within the grievance procedure?

Yes ☒ No ☐

If not, why? _____

VII. Statement of claim

State here (as briefly as possible) the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

I have been illegally arrested in the state of Arkansas
by the ^{West Memphis} Police Department they used unlawful individuals
one named Rickie Kirkendol in which has passed away,
and another named melvin Watson. Both are on parole,
and unable to work any law enforcement operations. I was
intraped by the police, and investigators. They worked the
convict's without required documents and policy from
the parole board. They then used evidence they searched
and seized to unlawfully detain, A wire tapping was
also obtained from the under-cover convict's that was used.
I had a personal issue with a police named ^{Stacey} Allen and
a girl friend. He was at all my parole hearings, and it's
strong evidence he had a lot to do with my unlawful
arrest. The police investigators did not prevent the first
contact with Rickie Kirkendol, they allowed crime to continue
to give me a harder sentence in prison. They knew this under-
cover needed help with drugs also, and did not give him proper
help with recovery. He passed away because of overdose I
have been violated of my private life by infringing on my rights
The unlawful acts has took everything I had

VIII. Relief A chance in civil court

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

Clause
Full investigation

It's many issues and merits in my case Subrogation is requested, and the court opinion's on the policy's is in need of a
I want a investigation done on the police investigators, and
the policy of the parole board, my hardship has deprived me
of life so I want a hearing or even better a civil trial to
find the connections of the unlawful act's that has me detained
unlawfully in pulaski county jail. I request a sum of \$500,000 if im
correct.
I declare under penalty of perjury (18 U.S.C. § 1621) that the foregoing is true and correct.

Executed on this 11th day of March, 2019.

Karen Ingram

Signature(s) of plaintiff(s)

Karlen Ingram #31474009
Pulaski County Jail
3201 Roosevelt Rd
Little Rock, AR 72204

LITTLE ROCK

AR 722

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Little Rock, AR 72201

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